

Comments on draft Honouliuli WWTP permit:

Permit:

1. Page 3 under section A.1. states "...lasting through the expiration date..." Recommend changing this to "lasting until the expiration date." Recommend this change be applied to interim effluent limits for enterococcus as well on page 5, section 6.a. (instead of through Jan., state until Jan.)
2. Page 3, footnote 4 to table needs to be a superscript next to DDT within table. Also, same for footnote 11 next to remaining priority pollutants in table.
3. Page 4, section 3 states, "where practicable,..." Recommend removing these words, since second sentence provides flexibility. These words make the permit less enforceable.
4. Table 6: The interim milestones in the compliance schedule for enterococcus are not yearly, and according to the CFR, they must be established yearly unless the actions are not readily divisible into yearly stages. If that is the case, progress reports can be included in place of the actions.
5. Table 6: Task 3 is missing a deadline. Per the consent decree, it appears this should be January 1, 2017.
6. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore.
7. Page 7, section B.2 cites the draft method (1998 date). It should cite the published method. It also should cite the West Coast methods manual for QA.
8. Page 8, section 4.c.: we may want to discuss changing the WET language here regarding dilution water, as recent guidance from Debra is that only lab water should be used (not receiving water) for compliance determinations. Also, the discussion of salt use should be removed, since not applicable.
9. Pages 9 and 10 – remove "or trigger" from accelerated testing language.
10. Page 14, section (4): change "...sources of pollutants, include:" to "...sources of pollutants, including:"
11. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring?
12. Pretreatment requirements: the urban area requirements under 301(h) are carried over. This is probably a good idea, since they are still operating at primary; however, when we discussed the first draft of Sand Island, we changed this language. Recommend consistent approach here with both permits. I like the fact sheet justification in Honouliuli for this requirement.
13. The Pretreatment report should be submitted February 28th, and the semi-annual reporting requirement is not a requirement now, but DOH may still want to carry that over.

14. Page 46: please change ML/MDL language to be consistent with decision on Wailua (ND to be reported as <MDL). I still think this language is California-based since there is discussion of the ML, whereas laboratories use RL.
15. Page 46: please change reporting requirements to EPA WTR-2 to be consistent with Wailua/Sand Island permits, including that only receiving water data be submitted.
16. Page 47: please change DMR submittal to the 28th day.
17. Page 48: please make sure reporting to WTR-2 is consistent with Sand Island requirements.

Fact Sheet:

18. Page 5: recommend use of recently approved 2012 303(d) list.
19. Data used for RPA through July 2012, which was a year ago. Can we use more recent data?
20. Page 7 discusses WET exceedances. Did the permittee conduct any TRE/TIEs?
21. Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum.
22. Page 22 states that the annual average effluent concentration is the same as the maximum effluent concentration for dieldrin. Is this correct?
23. Page 24 under antibacksliding justification for DDT, seems to indicate previous effluent limits, which is not consistent with the rest of the fact sheet that indicates there were no previous effluent limits. Please clarify.
24. Page 24, under ammonia assimilative capacity assessment, states the 303(d) list was reviewed for nitrate + nitrite...this section should be corrected to ammonia.
25. Page 24 regarding control stations, there seems to be a typo, since a station of MB7 was listed. Should this be HB7?
26. **Page 26 per Dan's note** – if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia.
27. Page 26 discussion of applicable enterococcus water quality standards: recommend citing CFR, where it discusses the criteria are applicable to Hawaii.

28. Pages 28-29: the compliance schedule discussion lacks justification that the schedule is “as soon as possible.” This is still doable with the constraints of the consent decree schedule.
29. Page 47 discusses a coral reef survey, but I did not see this in the permit. Please clarify.